

# Exhibit F

From: iStock Customer Service <service.is@istock.com>  
Sent: Monday, January 30, 2023 8:06 AM  
To: Paul Levy  
Subject: RE: copyright infringement demand letter from Higbee & Associates

Hi Peter,

I'm sorry I don't have an exact date, but it has been about 6 or 7 years now that we have been assisting customers with AdLife and PreparedFoodPhotos claims.

Thanks for sharing your letter with me as well, I have passed it along to our legal team so they are aware of this as well.

Best,  
Curt

Curt | Senior Customer Service Associate  
[REDACTED]

How was the service that I provided today? Please provide feedback.

----- Original Message -----

From: Paul Levy [plevy@citizen.org]  
Sent: 30/01/2023 5:33 AM  
To: service.is@istock.com  
Subject: RE: copyright infringement demand letter from Higbee & Associates

One more question: are you able to say WHEN it was that AdLife cancelled its agreement with you? That would be useful in informing prospective recipients of their demand letters?

I am attaching my letter to Prepared Food Photos' lawyer

From: iStock Customer Service <service.is@istock.com>  
Sent: Wednesday, January 25, 2023 10:32 AM  
To: Paul Levy <plevy@citizen.org>  
Subject: RE: copyright infringement demand letter from Higbee & Associates

Hi Peter,

For privacy reasons we do not share customer information with contributors, so no,

they wouldn't have  
any record of who licensed their content.

Our licensing permits an image to be used for multiple projects (or multiple clients), so many times it's a freelancer, contractor or a designer or web developer who no longer works for the company that has licensed the content. It could also be an affiliate or network that licensed the content for a company or organization, so sometimes tracking down the license can be a bit challenging.

Especially if you consider that many of these images were licensed 10 or more years ago, and with customer staff turnover etc., we have to sometimes go back and forth a few times with the customer to track the license down.

CopyCat is a legitimate copyright verification service, and are working on behalf of their client. AdLife and their affiliate entity PreparedFoodPhotos are particularly litigious, and your research will have already uncovered a lot of information (more than I can provide to you).

Thanks for doing what you do, I appreciate you!

Best,  
Curt

Curt | Senior Customer Service Associate  


How was the service that I provided today? Please provide feedback.

----- Original Message -----

From: Paul Levy [plevy@citizen.org]

Sent: 25/01/2023 7:31 AM

To: service.is@istock.com

Subject: RE: copyright infringement demand letter from Higbee & Associates

SO here is my question, really - do they get enough granular detail about licenses that they SHOULD be able to figure out for themselves whether a particular use was licensed?

I am going to be writing an article about this, and sending a letter to copycat legal about a specific demand letter that it issued, and I don't want to make an accusation about sleaziness without being confident that it is based on an accurate perception. My article is likely to be well publicized, and yes I will certainly include a reminder to check with you guys!

From: iStock Customer Service <service.is@istock.com>  
Sent: Wednesday, January 25, 2023 8:38 AM  
To: Paul Levy <plevy@citizen.org>  
Subject: Re: copyright infringement demand letter from Higbee & Associates

Hi Peter,

Getty Images has approximately 130,000 contributors to their sites, which include a number of different properties. Royalties for images that have been licensed are paid to our contributors, so yes, contributors are notified that their content has been licensed since they receive a royalty payment each time one of their images, illustrations or video clips is licensed.

AdLife and its affiliate company PreparedFoodPhotos have been pursuing Getty Images customers for a number of years now. AdLife pulled their content from all Getty Images sites quite a few years ago, which is their right to do. They then began pursuing Getty Images customers under the pretense of ensuring that the customer had licensed their content. Many companies have insurance to cover copyright infringement, and AdLife was hoping to capitalize on this since most companies would prefer to pay out a claim through their insurance rather than do some legwork to dispute a claim (or go to court). Copyright infringement claims typically begin at \$8,000 per image, so this is a lucrative endeavour for AdLife. This is why they have been doing it for so many years.

We offer copyright infringement claim support for no cost for our customers, but we can only help customers that reach out to us. If a customer chooses to dispute any claim themselves, they have to handle the claim themselves, as well as any court or legal fees. In our experience, customers who choose to dispute a copyright claim themselves end up paying either a portion or all of the claim, either out of pocket or through their company insurance. If a customer reaches out to us with a copyright

infringement claim and they have licensed the content through one of the Getty Images properties (even from one of our sites that is no longer active), we can prove the image has been licensed, and our claims and legal team will contact the legal entity directly to have the claim closed on our customer's behalf.

Our legal team here is keenly aware of the situation with AdLife and PrepareFoodPhotos. And yes, we have seen AdLife move between several legal teams over the years. Currently claims are initiated by their partner entity PreparedFoodPhotos who is using another legal team (CopyCat Legal). Again, we can only help customers who reach out to us, like in the case of Buehler Food.

If you can help put the word out to anyone who asks you to \*please\* reach out to us if they have received a copyright claim, we would appreciate it. We have a dedicated claims team that only works on copyright infringement cases. If someone has licensed content through any of the Getty Images sites (Photos.com, iStock.com, Thinkstock.com, GettyImages.com) and have received a copyright claim, we are here to help. The service team that I work on can be reached either by calling us on our toll free number or by emailing us at [service.na@gettyimages.com](mailto:service.na@gettyimages.com)

We are happy to help our customers who have licensed content from our service defend copyright infringement claims, and again there is no cost to our customers for us investigating a claim they have received.

Best,  
Curt

Curt | Senior Customer Service Associate  


How was the service that I provided today? Please provide feedback.

----- Original Message -----

From: Getty Images [autoresponse.gi@gettyimages.com]  
Sent: 24/01/2023 8:47 PM  
To: plevy@citizen.org  
Subject: Re: copyright infringement demand letter from Higbee & Associates

Hello,

Thank you for your inquiry, we are tracking it under the reference number 03449168 for you.

If you have a follow-up question or additional information, please respond to this email and it will be

appended to your original submission.

Your business is important to us and we strive to respond to all email inquiries as quickly as possible, typically within one business day. If your issue cannot wait that long, please give us a call.

Sincerely,

Your Getty Images Customer Service Team

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Your original inquiry submitted on [www.gettyimages.com](http://www.gettyimages.com) on 1/24/2023:  
copyright infringement demand letter from Higbee & Associates  
\*\* Created by response to original case 02043733 \*\*

I was on the sidelines of the dispute that arose between AdLife Marketing and Communications and Buehler Food, a small Ohio chain of grocery stores, after AdLife accused Buehler of infringing on the copyright of a photograph of cold cuts by using the photo in an advertising circular. It turned out the Buehler had bought a license to use the photo from Getty Images, through which, in turn, AdLife had previously made the photo available. After Buehler turned to Getty for assistance, you folks researched the matter and were able to confirm that Buehler had in fact bought a license. You contacted AdLife's lawyer (the Higbee firm) and they then dropped the claim

What I am wondering is whether, in circumstances like that one, when Getty sold a license for an individual photo, would it have told AdLife about the sale? That is, assuming AdLife was rigorous about keeping old records, should it have been able to reconstruct on its own what had happened, and thus avoided making demands in the first place? Or is this a situation where you would have given them only overall numbers without specifying which photo was licensed to whom?

Many of the smaller customers come to me for advice about these cases because I have written a number of articles about abuses by the Higbee firm, including demands for AdLife. Higbee no longer

represents AdLife, but another lawyer, who is even more aggressive, is now doing that work

From: iStock Customer Service <service.is@istock.com<mailto:service.is@istock.com>>  
Date: August 20, 2020 at 4:32:44 PM EDT  
To:  
Cc: "Sondra.Zaharias@gettyimages.com<mailto:Sondra.Zaharias@gettyimages.com>"  
<sondra.zaharias@gettyimages.com<mailto:sondra.zaharias@gettyimages.com>>,</p>
</div>

EXTERNAL: This email was sent by someone outside of Buehler's. Use caution when clicking on links or opening attachments.

Hi Peter,

Sondra is my colleague, and I am one of the Adlife specialists here at Getty Images. Sondra she asked me to reach out to about this claim. And yes, I quickly found the Buehler's license for this shrimp image on a Thinkstock account from 2015.

This situation with Adlife and their legal team Higbee & Associates has unfortunately been something we and many of our customers have become painfully aware of as it has played out over the past several years. It is a litigious situation that we and our customers have had to deal with on a case by case basis. Please note that you may receive another claim in the future - please reach out to us if you do, it is our pleasure to help with these situations.

Our hope is that every single customer that receives a similar claim reaches out to us to help prove they have licensed the content. Sadly, some customers feel it is more expeditious to offer a settlement amount instead of doing a bit of groundwork to deal with the situation.

Because this claim has gone to Adlife's legal team at Higbee & Associates, I have asked our claims team to reach out directly to Higbee & Associates to have this claim closed on your behalf. I have asked our claims team to let you know when this claim has been resolved and closed (this is a straightforward process now that we have confirmed the licensing). Once our legal team hears back from Higbee & Associates, they will let you know that this claim has been closed. You should be hearing from our claims team in the next week or so.

Adlife was a contributor to iStock and our sister site Thinkstock for a number of years. A number of years ago they decided to pull their content (which is their legal right to do). When a contributor decides for any reason to pull their content from iStock, we must remove all their assets, including the thumbnails of files from the download history of customer's accounts who licensed the files.

If you had found the licenses for these images in the Download History of the account you would have seen a missing thumbnail of the image. Even a small thumbnail of an image showing in the Download History of an account is intellectual property (this is why thumbnails of licensed content must also be removed).

Please note that our licenses are perpetual, so if you license a file and it is removed from our site by the artist or contributor, this does not affect the license you have for this file at all (it's just for legal reasons we are not able to allow anyone to download or re-download the file from our site once it has been deactivated). Like any art gallery, we are constantly adding content to our site (about 200,000 files per week, on average) and sometimes a file or files are removed by the contributor. If you have a license for an image and it has been removed from our site, you do NOT need to remove this image or cease using it - your license to use content from either Thinkstock or iStock is perpetual, regardless of if the content is removed from our site.

I am very glad I could help you out with this claim. There is no cost to you for us looking into this claim for you.

Please let me know if you need anything else - if you have a moment, please leave feedback for me at the link below (your feedback goes directly to my manager). And thanks very much for using Getty Images :-)

Cheers,  
Curt

Curt | Senior Customer Service Associate  




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[https://gettyimages--  
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